



INTEGRATED
WASTE SERVICES
ASSOCIATION

November 30, 1998

VIA FAX -- 919-541-0295

Dr. Larry G. Hart
Executive Secretary
National Toxicology Program
Board of Scientific Counselors'
Report on Carcinogens (RoC) Subcommittee
P.O. Box 12233
Research Triangle Park, N.C. 27709

Dear Dr. Hart:

On behalf of the Integrated Waste Services Association (IWSA), I am writing to express our concern that the NTP and its RoC Subcommittee are considering upgrading 2,3,7,8-tetrachlorodibenzo-para-dioxin (TCDD) to 'known human carcinogen' when there is considerable controversy as to the appropriate classification of the compound. TCDD should not be elevated to the status of 'known human carcinogen' without clear and convincing evidence from studies of human health impacts. The term "known" indicates certainty to the general public and most would not be aware that the listing is a hazard classification rather than a risk assessment.

The IWSA is a national trade group representing municipal waste combustors. IWSA members include American Ref-Fuel Company, Foster Wheeler Power Systems Company, Katy-Seghers, Montenay Power Corporation, Ogden Martin Systems, Inc., Westinghouse Electric Corporation, and Wheelabrator Environmental Systems Inc. Together, our members represent 65 MWC facilities nationwide. IWSA member facilities process approximately 85,000 tons of waste each day and generate about 2200 megawatts of electricity or enough energy to meet the electricity needs of more than two million households.

The waste-to-energy industry has worked cooperative with the U.S. EPA to implement federal MACT rules promulgated in 1995. These strict emission control standards, including stringent emission standards for dioxin, will ensure that waste-to-energy produces some of the cleanest power in America.

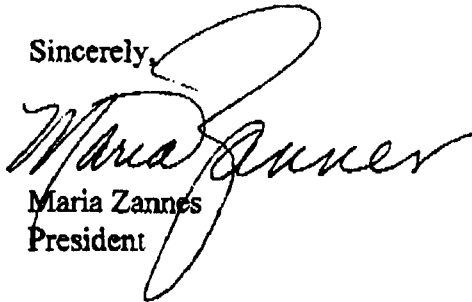
The waste-to-energy industry has had significant and unparalleled success in controlling

dioxin and dioxin-like compounds. According to EPA, our industry "will represent less than one percent of the known sources of dioxin when EPA's [MACT] rule is fully implemented" within the next two years. EPA estimates that the MACT rule "will reduce dioxin emissions from municipal waste combustors by at least 99 percent." (*Fact Sheet, Final Air Regulations for Municipal Waste Combustors, October 31, 1995*. See also EPA document called *National Dioxin Emissions Estimates from Municipal Waste Combustors, EPA Air Docket #A-90-45, VII-A-001*.)

The success our industry has had in controlling dioxin is a result of considerable operating and technical experience. We are acutely aware of the public reaction to this compound, and the emotional response invoked by merely mentioning the word 'dioxin.' We do not propose that your decisions be based on the politics of public reaction. Quite the contrary, we would ask that you dismiss public opinion and instead focus on the epidemiologic evidence directly linking TCDD to cases of cancer in humans. We believe that if the science is appropriately reviewed, the TCDD classification of "reasonably anticipated" must remain intact. Frankly, there are too many unanswered questions at this time.

Thank you for your consideration of our views.

Sincerely,



Maria Zannes
President